UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS AND USE OF MASSA	FILED ESK'S DE	- ·

Civil Action No.: 05-30074-MAP

U.S. POTRICTOR

TAMMY WALKER, Plaintiff	)
v.	)
CITY OF HOLYOKE, Defendant	) ) )

## MOTION TO EXTEND DISCOVERY DEADLINES (ASSENTED TO)

Now comes the Plaintiff in the above captioned matter through her undersigned counsel and hereby moves this honorable Court to extend each of the discovery deadlines for a period of sixty (60) days from (a) the date on which successor counsel files an appearance in this matter or (b) the date on which this Honorable Court grants Plaintiff's leave to withdraw as counsel for the Plaintiff.

As the basis for this Motion, the undersigned counsel represents to this Honorable Court that she has filed a motion for leave to withdraw and is seeking sufficient time for any successor counsel to engage in the discovery process. Defendant has assented to this motion.

WHEREFORE, the Plaintiff in the above captioned matter hereby moves for an extension of the discovery deadlines as specified hereinabove.

Respectfully Submitted,

THE PLAINTIFF, By Her Attorney

THE DEFENDANT, By Its Attorney

By: 300 80

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Dated: July 21, 2005

## **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the following via first class mail, postage prepaid to :

Carole Sakowski Lynch, Esq. Morrison, Mahoney & Miller, LLP 1500 Main Street, Suite 2400 P.O. Box 15387 Springfield, MA 01115-5387

Tani E. Sapirstein

Date: July 21, 2005

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